

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DIVISION OF VIRGINIA
DANVILLE DIVISION**

IN RE: **ANGELA H. MOON**

**CHAPTER 7 BANKRUPTCY
CASE NO: 09-62915**

**MOTION TO WAIVE THE REQUIREMENT TO TAKE CREDIT
COUNSELING AND PRE-DISCHARGE FINANCIAL MANAGEMENT COURSE**

Comes now Debtor, by Counsel, who asks that the Court waive the requirement that she take and complete the pre-bankruptcy credit counseling course before she filed her bankruptcy case and the requirement that she also do a pre-discharge financial management course. Debtor is currently incarcerated at the Fluvana Correctional Center for Women, a Commonwealth of Virginia prison, and she will continue to be incarcerated there for the at least the next 24 months.

Counsel for Debtor, Reginald R. Yancey, requested from the aforesaid Correctional Prison that she be allowed to bring a cellular telephone into the prison facility in order that it can be used to do the pre-filing credit counseling course for debtor. Said request was refused by said prison authorities and therefore, debtor is unable to complete the pre-filing credit counseling course before she file her bankruptcy case and be unable to do the pre-discharge financial management course. See attached copies of email letter(s) that was sent to the aforesaid Correctional Center and its' email response. Further, Debtor has certain physical and mental disabilities (or impairments) and she was receiving social security disability monthly benefits at the time of her incarceration.

WHEREFORE, the Debtor(s), by Counsel for Debtor, request her Motion be granted and for such other and further relief as to equity may seems meet.

Dated: 9-22-09

ANGELA H. MOON

By: /s/ RR Yancey

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